



Mr. James Saric
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USEPA Region 5
77 West Jackson Boulevard (SR-6J)
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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Tenth Semi-Annual Progress Report (August 2011 to January 2012)

Dear Jim:

Attached is the tenth semi-annual progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental Remedial Investigations/Feasibility Studies (SRI/FS). This progress report is submitted as per Section 7.2 of the Statement of Work (SOW) for the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigations/Feasibility Studies (Docket No. V-W-07-C-864). Per Section 7.2 of the SOW, the semi-annual progress reports "shall address all areas of the Site where Respondents perform SRI/FS activities and shall summarize overall progress in completing the work required by the AOC and SOW."

As per Section 1.1.1 of the SOW, "for each Area or OU of the Site with ongoing work, including ongoing monitoring and/or operation and maintenance of existing systems, the Respondents shall continue any such ongoing work unless modifications are approved in writing by USEPA. Reporting of any such ongoing work will be in accordance with the Schedule on Exhibit A of this SOW." To meet this requirement, this letter report also includes the fifth annual Area-specific work reports for Areas 3 through 7. The Master Schedule for the Site, which was submitted in March 2007, states "As appropriate, the annual Area-specific work reports may be included as an element of the Semi-Annual Progress Reports." As stated in Exhibit A, these reports are to be submitted "for each Area, annually until USEPA's approval of an Area-Specific Work Plan for that Area." Because USEPA approved a work plan for Area 1 as part of the AOC and approved a work plan for Area 2 in December 2010, there are no annual work reports included for Area 1 and Area 2.

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Date:
March 23, 2012

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Our ref:
B0064539.0003.00014

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS



Michael J. Erickson, P.E.
Vice President

Attachment

Copies:

Michael Berkoff, USEPA
Sam Borries, USEPA
Paul Bucholtz, MDEQ
Jeff Keiser, CH2M HILL
Todd Goeks, NOAA
Jessica Winter, NOAA
Richard Gay, Weyerhaeuser Company
Martin Lebo, Weyerhaeuser Company
Kathy Huibregtse, RMT Inc.
Garry Griffith, P.E., Georgia-Pacific LLC

**SEMI-ANNUAL PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE SRI/FS**

REPORT #10, AUGUST 2011 TO JANUARY 2012

**PREPARED BY ARCADIS
ON BEHALF OF GEORGIA-PACIFIC LLC**

SUBMITTED TO

**JAMES SARIC, REMEDIAL PROJECT MANAGER
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS**

REPORT #10, AUGUST 2011 TO JANUARY 2012

Areas of the Site where Supplemental Remedial Investigations/ Feasibility Studies (SRI/FS) Activities Have Been Performed Pursuant to the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) and Statement of Work (SOW)

- Operable Unit 5 (OU 5) – Kalamazoo River from Morrow Dam to Lake Michigan and Portage Creek from Alcott Street to the confluence.

Summary of Overall Progress in Completion Work Required by the AOC and SOW – Area 1, Area 2 and Multi-Area

AOC Requirements

- As discussed in Section 28b of the AOC, the United States Environmental Protection Agency (USEPA) and Michigan Department of Environmental Quality (MDEQ) were notified in advance of sample collection activities.
- The six monthly progress reports generated during the August 2011 to January 2012 period were submitted on time, as required by Section 27 of the AOC and Section 7.1 of the SOW.
- The Semi-Annual Progress Report for the period from February to July 2011 was submitted on time, as required by Section 7.2 of the SOW.
- As discussed in Section 48a of the AOC, the validated data that have been generated to date have been submitted on time as part of the monthly progress reports.

SOW Requirements

Task 1. Project Scoping and SRI/FS Planning Documents

Submittals approved by USEPA and finalized:

- On October 26, USEPA provided ARCADIS with conditional approval of the *Soil and Sediment Field Sampling Plan for the Otsego City Impoundment (Area 2)* (Area 2 FSP). ARCADIS submitted the final Area 2 FSP to USEPA on November 22.
- On October 26, USEPA approved the use of the TestAmerica Laboratories, Inc. (TestAmerica) protocol for SW846 Method 8082 for PCB analysis of soils and sediments.

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Activities toward completion of other requirements:

- On August 23, ARCADIS forwarded letters to four property owners requesting access for soil sampling related to Otsego City Impoundment. The first access letter was signed on August 25.
- On December 1, ARCADIS requested information from the USEPA Field Environmental Decision Support (FIELDS) Team regarding the proposed Portage Creek post-removal PCB surface-weighted average concentration (SWAC).
- On December 15, USEPA hosted a public meeting to provide a general project update on work conducted in the summer and fall of 2011. Representatives of Georgia-Pacific and ARCADIS attended.
- On December 28, ARCADIS submitted the draft *Former Plainwell Impoundment and Plainwell No. 2 Dam Area 2011 Bank Conditions Monitoring Report* to USEPA.
- On January 23, ARCADIS forwarded to the Michigan Department of Natural Resources a Freedom of Information Act (FOIA) request for the past three years of project files.
- On January 23, ARCADIS forwarded to USEPA a FOIA request for the project files from February 2007 to present, and the Weyerhaeuser project files from December 2004 to present.
- On January 23, ARCADIS forwarded to MDEQ FOIA requests for review of the past two years of project files, and for a copy of MDEQ's current filing and document retention protocols.
- On January 23, MDEQ forwarded information to ARCADIS regarding filing and document retention protocols in responses to a FOIA request.
- On January 24, ARCADIS forwarded to the Michigan Department of Attorney General a FOIA request for the past two years of project files.

Submittals awaiting completion:

- Georgia-Pacific awaits USEPA's approval of the *Former Plainwell Impoundment and Plainwell No. 2 Dam Area 2011 Bank Conditions Monitoring Report* submitted on December 28.
- Georgia-Pacific awaits information on the Portage Creek proposed post-removal PCB SWAC requested on December 1.

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Task 2. Site Characterization

- In August, ARCADIS resurveyed the erosion pins in Area 2 – the Otsego City Impoundment.
- In October, ARCADIS collected floodplain and bank soil samples in the Otsego City Impoundment. Samples were submitted to TestAmerica for PCB analysis and non-PCB analysis.
- In November, ARCADIS collected sediment samples in the Otsego City Impoundment. Samples were submitted to TestAmerica for PCB analysis and non-PCB analysis.
- In January, ARCADIS resurveyed the erosion pins in Area 2 – the Otsego City Impoundment.

Task 3. Remedial Investigation Report (including ecological and human health risk assessment)

- Between August 1 and September 27, ARCADIS submitted to USEPA and MDEQ several interim deliverables related to the draft *Area 1 Supplemental Remedial Investigation Report* (Area 1 SRI Report).
- On August 4, ARCADIS, Georgia-Pacific, and USEPA participated in a conference call to discuss the draft Area 1 SRI Report.
- On August 8 and 9, ARCADIS forwarded to USEPA draft responses to CH2M HILL's comments on the draft Area 1 SRI Report.
- On August 9 and 15, representatives of ARCADIS, Georgia-Pacific, USEPA, and MDEQ participated in conference call to discuss MDEQ comments on the draft Area 1 SRI Report. ARCADIS submitted responses to specific MDEQ comments on August 12, 18, 22, and 26.
- On August 30, ARCADIS forwarded to USEPA a request to revise the Area 1 SRI Report submittal date to October 3. USEPA approved the request on September 1.
- On September 6 and 9, representatives of ARCADIS, Georgia-Pacific, USEPA, and MDEQ participated in conference calls to discuss Area 1 SRI Report interim deliverable feedback.
- On September 8, representatives of ARCADIS, CH2M HILL (on behalf of USEPA), and CDM (on behalf of MDEQ) participated in a conference call to discuss the draft Terrestrial Baseline Ecological Risk Assessment for Area 1 (Area 1 TBERA) risk characterization.
- On September 22, representatives of ARCADIS, Georgia-Pacific, and CH2M HILL participated in a conference call to discuss feedback on the Area 1 SRI Report floodplain and hot spot write-ups.

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REPORT #10, AUGUST 2011 TO JANUARY 2012

- On October 3, ARCADIS submitted the revised Area 1 SRI Report to USEPA.
- On October 21, ARCADIS submitted to USEPA the responses to comments received from USEPA and MDEQ on the draft Area 1 SRI Report.
- On November 7, ARCADIS participated on a conference call with representatives of Georgia-Pacific and the USEPA to discuss the status of responses to the Area 1 SRI Report comments.
- On December 20, USEPA forwarded to ARCADIS its disapproval and comments on the Area 1 SRI Report. Representatives of USEPA, MDEQ, ARCADIS, and Georgia-Pacific participated in a call that day to discuss the comments.
- On December 22, MDEQ forwarded to ARCADIS its comments on the Area 1 SRI Report.
- On January 4, Georgia-Pacific e-mailed USEPA asking that the due date to file dispute resolution regarding the draft Area 1 SRI Report be set for January 13. USEPA provided written approval that day.
- On January 6, representatives of ARCADIS, Georgia-Pacific, USEPA, and CH2M HILL participated in a conference call to further discuss USEPA's comments on the draft Area 1 SRI Report.
- On January 10, ARCADIS provided to USEPA preliminary draft responses to USEPA's comments on the draft Area 1 SRI Report.
- On January 13, ARCADIS forwarded to USEPA Georgia-Pacific's objection to a number of USEPA's comments on the draft Area 1 SRI Report, and invoked dispute resolution.
- On January 19 and 23, ARCADIS and John Kern (on behalf of USEPA) participated in conference calls to discuss the analysis of the Housatonic River Shrew Study data provided in the MDEQ comments on the TBERA for Area 1.
- On January 19, John Kern forwarded to ARCADIS a paper regarding shrews (i.e., Getz et al. 2004), and ARCADIS forwarded to John Kern an appendix from the Housatonic River Baseline Ecological Risk Assessment where USEPA describes their reanalysis of the shrew study data.
- On January 20, ARCADIS forwarded to John Kern copies of papers that discuss survival of short-tailed shrews (i.e., Pearson 1945 and Dapson 1968).
- On January 24, USEPA forwarded to ARCADIS responses to ARCADIS' January 10 proposed responses to USEPA's comments on the draft Area 1 SRI Report.

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- On January 26, representatives of ARCADIS, Georgia-Pacific, USEPA, CH2M HILL, MDEQ, and CDM participated in a conference call to discuss MDEQ's comments on the draft Area 1 SRI Report.
- On January 30, ARCADIS forwarded to USEPA a complete set of responses to USEPA's comments on the draft Area 1 SRI Report.

Task 4. Treatability Studies (if needed)

- No meetings, submittals, or notifications occurred during this reporting period.

Task 5. Development of Screening Alternatives (Technical Memorandum)

- On November 7, ARCADIS participated on a conference call with representatives of Georgia-Pacific and USEPA to discuss Area 1 Alternatives Screening Technical Memorandum (Area 1 ASTM) planning.
- On January 12, representatives of ARCADIS, Georgia-Pacific, USEPA, and MDEQ met to discuss the Area 1 ASTM in Detroit. A draft agenda was distributed on January 6.
- On January 31, ARCADIS forwarded to CH2M HILL slides from the January 12 Area 1 ASTM meeting that discuss use of home range in evaluating the various terrestrial numbers.

Task 6. Detailed Analysis of Alternatives (FS Report)

- No meetings, submittals, or notifications were completed for this reporting period.

Task 7. Progress Reports

- The six monthly progress reports generated during the August 2010 to January 2011 period were submitted on time, as required by Section 7.1 of the SOW.
- The ninth semi-annual report for Area 1 was submitted to USEPA on August 15, as required by Section 7.2 of the SOW.

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS**

REPORT #5, FEBRUARY 2011 TO JANUARY 2012

ANNUAL AREA-SPECIFIC WORK REPORTS (AREAS 3 THROUGH 7)

Summary of Overall Progress in Completing Work Required by the AOC and SOW

Areas 3 through 7

- On October 13, representatives of Georgia-Pacific, ARCADIS, USEPA, and MDEQ participated in a conference call to discuss the *Area 3/Former Otsego Impoundment Supplemental Remedial Investigation/Feasibility Study Work Plan* (Area 3 SRI/FS Work Plan). ARCADIS distributed a slide deck and outline pertaining to the Area 3 SRI/FS Work Plan for discussion on this call on October 13.
- On November 29, ARCADIS submitted the Area 3 SRI/FS Work Plan to USEPA.
- On January 24, ARCADIS e-mailed USEPA to confirm that USEPA was not participating in the Area 3 site walk.
- On January 30, USEPA forwarded to ARCADIS its comments on and disapproval of the Area 3 SRI/FS Work Plan.
- On January 30, ARCADIS e-mailed USEPA to request approval for a flyover of Area 4, the former Trowbridge Impoundment.